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From: Station26@a-b-c-plus.com%inter2 [Station26@a-b-c-plus.com] on behalf of Station26@a-b-c-plus.com
Sent: Monday, August 15, 2005 4:54 PM
To: National List
Subject: Docket Number TM-0407
Attachments: ATTACHMENT.TXT

Arthur Neal:

Helfter Feeds, Inc.® is an Organic processor/handler producing products and programs for organic livestock production with the philosophy of applied common sense to animal health.

We supply the body with what it needs to naturally repair and protect itself. For this reason we are submitting a comment because of the proposed rulemaking in the Federal Register concerning Sunset review of the synthetic and non- synthetic substances allowed in organic production and handling. We would be going back instead of moving forward by removing these allowable ingredients.

Domestic animals today are restricted to ranches, pastures, feedlots and confinement buildings. The availability of natural sources of minerals and vitamins has dwindled as pressure is greater than ever before to perform. Feedstuffs contain less and less of the essential nutrients so necessary for the health and welfare in livestock production.

Heavy crop production has deleted much of the natural nutrient content of the soils and if it is not in the soils, it cannot be in the feedstuffs.

For instance, fertilizers aid in replenishing major minerals, however, minor minerals tend to be neglected with resultant mineral imbalance in the animal.

There is demand for rapid gains to get an animal finished and get to market fast as possible which stresses demand for balance and availability of nutrients that are possibly not there to meet that demand. Increase amounts of vitamins and minerals are needed to cope with rapid and heavy growth.

We feel there is not the proper supply of nutrients needed from organically grown crops to fulfill the needs of animals and therefore rely heavily on the alternatives of synthetics to fulfill the nutritional needs. The synthetics in question are formulated with skill and experience of decades of livestock nutrition experience and have not proven harmful to health or the environment.

They are necessary because of the unavailability of wholly non-synthetic alternatives and are consistent and compatible with organic practices.

The substances under the Sunset Process should be renewed by the Secretary as nutrient- inner relationships in an animals body are very complex and no one completely understands it.

The best authority on animal nutrition is the animal itself and our programs are based on this principle which have led to successfully raising livestock for 35 years.

Our philosophy is very simple, "If it's not broke, why fix it?"

(Ingredients of concern)

Synthetics allowed

205.603 Drinking water act- Hydrogen Peroxide

Copper sulfate, Iodine- topical treatment, external paraciticide or local anesthetic as applicable.

Feed supplements- milk replacers without antibiotics

Feed additives- trace minerals used for enrichment and fortification when FDA approved

Vitamins- for enrichment and fortification when FDA approved

205-605

Non-agricultural (non-organic allowed) in or on processed products labeled as organic or made with organic ingredients.

Non-synthetics allowed produce by microbial fermentation of carbohydrate substances- citric acid, lactic acids

Bentonite, calcium carbonate, dairy cultures, diatomaceous earth

Enzymes- derived from edible non-toxic plants, non-pathogenic fungi or non-pathogenic bacteria.

Flavors- non-synthetic sources only not produced from synthetic solvents

Magnesium sulfate- non-synthetic sources only

Methionine

Potassium chloride

Potassium iodide

Yeast- non-synthetic (bakers and brewers)

Synthetics allowed- ascorbic acid, calcium citrate, Calcium phosphates (mono-basic) dia-basic, tri-basic)

Ferrous sulfate

205.606

Non-organically produced agricultural allowed

Cornstarch (native)

Kelp

Lecithin (unbleached)

Pectin (high-methoxy)

If we can answer any questions please feel free to contact, Jim Helfter at 866-435-3837.

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